

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Provision of Directory Listing Information under
The Telecommunications Act of 1934, as amended

CC Docket No. 99-273

In the Matter of

Telecommunications Relay Services and Speech-to-
Speech Services for Individuals with Hearing
and Speech Disabilities

CC Docket No. 98-67

Reply Comments of Illuminet, Inc.

Illuminet, Inc. ("Illuminet") hereby files these reply comments in response to the April 27, 2000 Public Notice issued by the Federal Communication Commission ("Commission") in the above-captioned proceedings. In these reply comments, Illuminet comments solely on the implementation issues associated with the appropriate database platform to be utilized for "411" directory assistance ("DA") presubscription. In its initial comments, Illuminet noted that while the use of the Advanced Intelligent Network ("AIN") was appropriate for "411" DA presubscription, Telegate's proposed creation of seven new regional databases was unnecessary to achieve "411" DA presubscription. The record in this proceeding demonstrates, however, that existing Line Information Database ("LIDB") provides a more efficient and rapid means of implementing "411" DA presubscription.

Comments filed in this proceeding further substantiate Illuminet's position that the LIDB platform is the best vehicle for implementation of "411" DA presubscription. As noted previously, the LIDB platform has a proven track record of meeting the needs of the telecommunication industry by providing the flexibility necessary to respond to competitive opportunities and the resulting requirement for services. The LIDB today functions in a portability environment and its content (providing information to the customer line level) will

meet the needs of carriers for billing purposes. The DA Provider could even respond to regulatory requirements or business requests for branding by launching a query to the LIDB.

Several parties cited the cost of constructing and maintaining new databases and the associated need for expensive SS7 service transfer points ("STP") and service control points ("SCP") as negating any public benefit resulting from opening "411" DA to competition. A LIDB based platform for "411" DA presubscription, however, eliminates a large part of the cost that the Telegate proposal would impose on the industry. With no need for new databases or new STPs and SCPs deployed solely for the purpose of providing a "411" DA solution, the cost-benefit analysis changes dramatically.

While the existing LIDB may require capacity upgrades for query capacity and/or data storage capacity, those expenditures would be incremental to the existing system, rather than the substantial expenses involved in designing and building a new database system. While many opponents to "411" DA presubscription offered cost estimates of the nationwide conversion, these estimates were based upon estimates of individual company costs, which were then applied to the entire network. Accordingly, these estimates are merely speculative because the costs for implementation of competitive DA would vary by each service provider. In addition, it is unclear whether these estimates may include the costs of generic upgrades to meet other industry or company objectives. Attributing all such costs to "411" DA presubscription would seem unreasonable because of the regularity with which most service providers upgrade the functionality of their entire network to meet industry standards. Illuminet would also expect the Commission, if it were to order "411" DA presubscription, to provide for extensions or waivers for those carriers who would be unduly burdened.

In order for the Commission to make its economic analysis, the cost of implementing "411" DA presubscription through a LIDB platform would include several cost elements that may collectively be within the range of reasonableness assuming a finding of consumer benefits from

increased "411" DA competition. Industry standards committees would have to identify a new data element to identify the "411" DA Service Provider, and that data element would have to be installed in LIDB administration systems and databases. A query type, such as GetData, OLNS or some other industry standard, would have to be deployed. Illuminet notes that most LIDBs have GetData and/or OLNS ability today; either could be used for competitive "411" DA. And, as with any new service, local exchange carriers would need to modify their service order systems. These incremental adaptations to access the existing LIDB would undoubtedly be significantly lower than Telegate's proposed solution of implementing seven new database centers.

Just as the LIDB has proven to be workable for real time call processing today, it can as easily and effectively process "411" DA queries in both a wireline and wireless environment tomorrow. After presubscription occurs, a wireline caller seeking to make a "411" DA Call would dial 411. At the end office, the originating trigger/N11 would recognize the call and route the call to an AIN platform. The AIN platform would launch a query based on the originating line number to the LIDB. The LIDB would respond with the originating "411" DA Service Provider and could also provide other information, such as service and or equipment indicator, account owner, or any "411" DA restrictions. The caller's carrier would then route the call to the "411" DA provider associated with the originating line.

Using the Wireless Intelligent Network (WIN) technology, a wireless call would be processed similarly. Even where N11 capability does not exist, DA Presubscription calls could be processed. The caller would dial 411 or #411 or *411; the Mobile Service Center (MSC) recognizes the trigger and routes the call to the WIN platform. The WIN platform launches a query based on the caller's line number to LIDB. The LIDB responds with the originating number's DA Service Provider and potentially other information, such as service or equipment

indicator, account owner, or "411" DA restrictions. The wireless carrier would then route the call to the "411" DA provider presubscribed to by the originating line.

Illuminet offers no opinion on whether "411" DA presubscription assistance is in the public interest. However, based upon its experience as a major provider of services of Signaling System 7 ("SS7") network functions and related Line Information Database services, Illuminet submits there is a less costly, technically feasible and more economically efficient way of implementing "411" DA presubscription than Telegate's proposal to build new databases. If the Commission finds "411" Presubscribed DA to be in the public interest, Illuminet believes the existing and upgradable capabilities of the LIDB platform should be used to implement the service.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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